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Counsel for Defendant QUINN

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
DAVID QUINN,  
  
Defendant.

**Case No.:** CR 21-0149 YGR

**STIPULATION AND ~~PROPOSED~~  
ORDER CONTINUING CHANGE OF  
PLEA AND SENTENCING FROM  
OCTOBER 28, 2021 TO DECEMBER 9,  
2021**

IT IS HEREBY STIPULATED, by and between the parties to this action that the change of plea and sentencing date for defendant David Quinn in the above referenced case, currently scheduled for Thursday, October 28, 2021, at 10:30 a.m. before Honorable Yvonne Gonzalez Rogers, may be continued to Thursday, December 9, 2021, at 1:00 p.m., for change of plea and sentencing. The reason for the request is that the additional time will enable defense counsel to provide the probation officer with signed consent forms so that the draft pre-plea presentence report (PSR) can be issued and reviewed, and for additional information to be provided to the probation officer prior to the

1 issuance of the final presentence report. Should the Court continue the matter to December 9, 2021, it  
 2 should provide sufficient time for the draft PSR to be issued, and for defense counsel to meet with  
 3 Mr. Quinn to review the documents and prepare for the change of plea and sentencing. United States  
 4 Probation Officer Karen Mar is aware of the requested continuance and has no objection. USPO Mar  
 5 is available, should the Court continue the change of plea and sentencing to December 9, 2021, at  
 6 1:00 p.m.

7 The continuance is sought under the Speedy Trial Act. The parties agree and stipulate that the  
 8 time until December 9, 2021, should be excluded, under 18 U.S.C. §3161(H)(7)(A) and (B)(iv), for  
 9 effective preparation of counsel taking into account due diligence because the ends of justice served  
 10 by the granting of the continuance outweigh the best interests of the public and the defendant, in that  
 11 the additional time will enable probation to issue the draft PSR and for counsel to meet with Mr.  
 12 Quinn and prepare for the change of plea and sentencing.

13  
 14 IT IS SO STIPULATED.

15  
 16 Dated: October 5, 2021

17 GEOFFREY A. HANSEN  
 18 Acting Federal Public Defender  
 Northern District of California

19 /S

20 JOYCE LEAVITT  
 Assistant Federal Public Defender

21  
 22 Dated: October 5, 2021

23 STEPHANIE M. HINDS  
 24 Acting United States Attorney  
 Northern District of California

25 /S

26 NOAH STERN  
 Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID QUINN,

Defendant.

Case No.: CR 21-0149 YGR


~~[PROPOSED]~~ ORDER CONTINUING  
CHANGE OF PLEA AND SENTENCING  
FROM OCTOBER 28, 2021 TO  
DECEMBER 9, 2021

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the change of plea and sentencing date in the above referenced case for defendant David Quinn, currently scheduled for Thursday, October 28, 2021, at 10:30 a.m. before Honorable Yvonne Gonzalez Rogers, is continued to Thursday, December 9, 2021, at 1:00 p.m. for change of plea and sentencing.

IT IS FURTHER ORDERED that the time until December 9, 2021, is hereby excluded, under 18 U.S.C. §3161(H)(7)(A) and (B)(iv), for effective preparation of counsel taking into account due diligence. The ends of justice served by the granting of the continuance outweigh the best interests of the public and the defendant, to allow the parties to receive and comment upon the draft PSR, and Mr. Quinn sufficient time to prepare for the change of plea and sentencing.

IT IS SO ORDERED.

Dated: October 12, 2021

  
HON. YVONNE GONZALEZ ROGERS  
United States District Judge